

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	CRIMINAL NO. AU-18-0410(17)-RP
	§	
CARLOS ZAMUDIO	§	

**UNOPPOSED MOTION TO DESIGNATE CASE AS COMPLEX AND EXTEND
PRE-TRIAL DEADLINES AND TRIAL DATE**

TO THE HONORABLE ROBERT PITMAN:

Defendant Carlos Zamudio files his written request to extend the deadline for filing pre-trial motions as well as the *Ellis* deadline and the trial date and would respectfully show:

1. Defendant was indicted on December 18, 2018 and charged with conspiracy to possess with intent to distribute 5 kilograms or more of cocaine in violation of 21 U.S.C. § 846. The drug trafficking conspiracy allegedly occurred from January 2017 to Indictment and involved several co-defendants, some of whom are apparently still fugitives.
2. Defendant has been released from custody under the supervision of U.S. Pretrial Services.
3. The Court has set the following schedule for the case: hearing on pre-trial motions on March 29, *Ellis* deadline March 26, jury selection and trial April 8.
4. Counsel for Defendant has yet to receive any discovery. Counsel for the Government has indicated that discovery will be available no earlier than March 12, if then. Discovery is anticipated to be at least 500 gigabytes. While not voluminous by

current standards, it is more than counsel will be able to review and prepare for trial by April 8.

5. Defendant therefore requests that the Court designate this case as complex for purposes of the Speedy Trial Act and find that “it is unreasonable to expect adequate preparation for pretrial proceedings or for the trial itself within the time limits established” by the Speedy Trial Act.
6. Defendant further requests that the Court extend the deadlines set forth above to enable Defendant and his counsel to review the discovery and prepare for trial if necessary.

For the foregoing reasons, Defendant prays that the Court grant this motion.

Respectfully submitted,

/s/ James R. Young

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CERTIFICATE OF SERVICE

I hereby certified that a true copy of the foregoing motion was served upon counsel for the United States as well as counsel for each co-defendant by using the Court's electronic filing system on March 12, 2019.

/s/ James R. Young
JAMES R. YOUNG
Attorney for Carlos Zamudio

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**ORDER TO DESIGNATE CASE AS COMPLEX
AND EXTEND PRETRIAL DEADLINES AND TRIAL DATE**

CAME ON to be heard Defendant Carlos Zamudio's motion to designate this case as complex and to extend the pre-trial deadlines and trial date, as said motion is hereby:

(GRANTED) (DENIED)

SO ORDERED this ____ day of _____, 2019.

HON. ROBERT PITMAN
United States District Judge